

EXHIBIT 14
SECOND AFFIDAVIT OF
IAN SMITH

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES,

Plaintiff,

WALKER RIVER PAIUTE TRIBE,

Plaintiff-Intervenor,

vs.

**WALKER RIVER IRRIGATION DISTRICT
a corporation, et al.,**

Defendants.

**IN EQUITY NO. C-125-MDD
Subproceeding:
3:73-CV-00127-MDD-WGC**

**HON. MIRANDA DU
Presiding Judge**

NAME OF PARTY: The United States of America

DESCRIPTIVE SUMMARY: Fed. R. Civ. P. 56(c)(1) Second Verified Statement of Ian Smith

NUMBER OF PAGES: 3

DATE OF SERVICE: November 17, 2020

EXHIBIT 14 – SECOND AFFIDAVIT OF IAN SMITH

I, Ian Smith, state under oath:

1. I am a Principal Historian at Historical Research Associates, Inc. (HRA), in Missoula, Montana, where I have been employed as a professional historian since 2000. During the past two decades, I have completed research and provided historical analysis on several legal cases involving Native American land and water rights, as well as other issues, for federal, state, tribal, and private clients. I have also provided expert testimony in both federal and state court proceedings.
2. As a historian, I and my HRA colleagues have been retained by the United States to collect true and correct copies of historical documents concerning the Walker River Indian Reservation (and activities thereon) and, when necessary, to analyze

those documents to discern their meaning in context of related activities concerning the history of the Walker River Indian Reservation.

3. I hereby certify that I or my HRA colleagues have collected true and correct copies of the following documents from the locations identified. Each document has been previously disclosed to Principal Defendants with the corresponding bates numbers.
 - a. Cross Examination of J. C. Stevens, Plaintiff and Appellant's Statement of the Evidence at 1450–1496, *United States v. Walker River Irrigation District*, 11 F. Supp. 158 (D. Nev. Dec. 29, 1937) (No. C-125)
 - i. Retrieved from: U.S. District Court for the District of Nevada, Reno, NV
 - ii. Bates Number: US0031302–US0031348
 - b. Cross Examination of Elvin W. Kronquist, Plaintiff and Appellant's Statement of the Evidence at 135–86, *United States v. Walker River Irrigation District*, 11 F. Supp. 158 (D. Nev. Dec. 29, 1937) (No. C-125)
 - i. Retrieved from: U.S. District Court for the District of Nevada, Reno, NV
 - ii. Bates Number: US0029970–US0030021
4. These documents are attached to Plaintiffs' Notice of Errata as Exhibits 15 and 16.

Ian Smith

Ian Smith

Principal Historian

Title

125 Bank Street, Suite 500
Missoula, MT 59802

Work Address

Subscribed and sworn before me this 6 day of November, 2020.

Barbara Swalling

Notary Public

2/9/2022

My Commission Expires

